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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 27, 2012

Mr. Gary G. Miller, Remedial Project Manager
U.S. EPA, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: December 29, 2010 Draft Memorandum to Gary Miller, U.S.EPA Region 6, *Draft Addendum 2 to the Sediment Sampling and Analysis Plan (SAP) for Additional Sediment Sampling South of Interstate Highway 10 (I-10)*
San Jacinto River Waste Pits Federal Superfund Site
Harris County, Texas

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) Remediation and Toxicology Divisions have completed review of the December 29, 2010 Draft Memorandum to Gary Miller, project manager, U.S. Environmental Protection Agency (EPA). The Draft Memorandum indicates that Draft Addendum 2 to the Sediment Sampling and Analysis Plan (SAP) was prepared in response to a letter from the EPA (Miller 2011a, pers. comm., dated December 9, 2011), requiring the collection of sediment and other samples south of I-10. In the comments on the draft Preliminary Site Characterization Report, the EPA has indicated that uncertainties in the potential for movement of chemicals from soil to the aquatic environment are unacceptable (Miller 2011b, pers. comm., dated December 9, 2011). It appears that the subject document was drafted in response to comments provided by the EPA. It is imperative that the EPA project manager provide other regulators with copies of correspondence with the Potential Responsible Party (PRP) representatives to facilitate an effective review of site documents and to determine if our previous comments were satisfactorily conveyed in EPA correspondence.

General Comment

Based on the Draft Memorandum review, the TCEQ supports the collection of sediment cores at the three proposed locations. To address potential historical and current runoff pathways, we also suggest the addition of a fourth core sample along the western shoreline of the peninsula within an inlet roughly along the line between sediment sample location SJNE018 and soil sample location SJSBo06.

Section: "Analysis of Existing Information and Selection of Analytes"

This section indicates that sediment samples will only be analyzed for aroclors because concentrations of polychlorinated biphenyls (PCBs) have been very low in sediments with and near the northern impoundment; however, conditions at one site do not necessarily mimic conditions at another site. As stated in previous comments, due to the potential for weathering to cause aroclors not to be detected when PCBs may in fact be present, the TCEQ recommends a congener-specific analysis of PCBs prior to being screened out on aroclor analysis.

This section also states that sufficient sediment from each sample will be archived for possible future analysis of dioxin-like PCB congeners. What are the criteria for future analysis? As stated in previous comments, the EPA September 2009 draft *Recommended Toxicity Equivalency Factors (TEFs) for Human Health Risk Assessments of Dioxin and Dioxin-Like Compounds* recommends the use of the consensus TEF values for 2,3,7,8-tetrachlorodibenzo-p-dioxin and dioxin-like compounds, including polychlorinated dibenzo-p-dioxins (PCDDs), polychlorinated dibenzofurans (PCDFs), PCBs, published in 2005 by the World Health Organization (WHO). Texas Risk Reduction Program (TRRP) Figure: 30 TAC §350.76(d)(2)(B) indicates the TEFs to be used for dioxin-like compounds, which also includes dioxin-like PCBs. Although TRRP has not yet been revised to include the 2005 WHO TEFs, it is recommended that those TEFs be considered when calculating a toxicity equivalent (TEQ), especially if they result in a higher TEQ.

If you have any questions please contact Vickie Reat at 512-239-6873, Tracie Phillips at 512-239-2269, or myself at 512-239-6368.

Sincerely,



Ludmila Voskov, P.G., Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

LV/cw

cc: Vickie Reat, TCEQ
Tracie Phillips, TCEQ
Chuck Stone, TCEQ